

*RFB received 12/3/04*

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Kevin J. Moles  
Manager Regulatory Affairs

November 23, 2004

RA 04-0143

*10/14/04*

*69 FR 61049*

*17*

Michael T. Lesar  
Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration, Mail Stop: T-6D59  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Docket No. 50-482: Establishing and Maintaining a Safety Conscious Work Environment

Dear Mr. Lesar:

Wolf Creek Nuclear Operating Corporation (WCNOC) acknowledges comments made on a proposed generic communication to provide guidance for licensees in regards to maintaining a safety conscious work environment (SCWE). WCNOC has reviewed NEI letter dated November 15, 2004, and endorses these comments.

WCNOC understands and embraces the need to continually re-establish and maintain a safety conscious work environment. However, WCNOC would like to take this opportunity to emphasize some key issues:

- 1) SCWE remains under the sole responsibility of the licensee.
- 2) Such guidance only provides a means for improving the way the SCWE is established and maintained.
- 3) All actions are not going to be applicable and/or practical for all licensees because such actions may be resource intensive and cumbersome under certain situations.

As a result, WCNOC feels more emphasis should be placed in the Regulatory Issue Summary (RIS), "Establishing and Maintaining a Safety Conscious Work Environment" to clearly note that the RIS should not be used as inspection guidance. WCNOC would refer to this RIS, only as a reference to improve and maintain the 1996 NRC Policy Statement, "Freedom of Employees in the Nuclear Industry to Raise Safety Concerns Without Retaliation." The RIS should make it clear that, not employing one or more of the actions in the RIS should not make a SCWE program deficient.

*SISP Review Complete*

*E-RIS = ADM-03*

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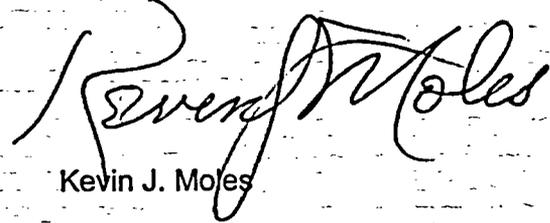
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*Call = A. Markley (ADM)*

*Template = ADM-013*

WCNOC appreciates the opportunity to provide comments on this proposed document. If there are any questions, please contact me at (620) 364-4126 or Diane Hooper at (620) 364-4041.

Very truly yours,

A handwritten signature in black ink that reads "Kevin J. Moles". The signature is written in a cursive style with a large, stylized initial "K".

Kevin J. Moles

KJM/rlg

cc: J. N. Donohew (NRC)  
D. N. Graves (NRC)  
B. S. Mallett (NRC)  
Senior Resident Inspector (NRC)  
Document Control Desk (NRC)